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ORIGINAL

JOHN F. MUNGER  
MARK E. CHADWICK  
MICHAEL S. GREEN  
KATHLEEN DELANEY WINGER  
KEVIN R. HARPER

**MUNGER CHADWICK, P.L.C.**  
ATTORNEYS AT LAW  
A PROFESSIONAL LIMITED LIABILITY COMPANY  
NATIONAL BANK PLAZA  
333 NORTH WILMOT, SUITE 300  
TUCSON, ARIZONA 85711  
(520) 721-1900  
FAX (520) 747-1550  
MungerChadwick.com

MICHAEL M. RACY  
GOVERNMENT RELATIONS DIRECTOR  
(NON-LAWYER)  
DIRECT LINE: (520) 906-4646

PHOENIX APPOINTMENT ADDRESS:  
5225 N. CENTRAL  
SUITE 235  
PHOENIX, ARIZONA 85012-1452  
(602) 230-1850

OF COUNSEL  
LAWRENCE V. ROBERTSON, JR.  
ADMITTED TO PRACTICE IN:  
ARIZONA, COLORADO, MONTANA,  
NEVADA, TEXAS, WYOMING,  
DISTRICT OF COLUMBIA

OF COUNSEL  
MILLER, LA SOTA AND PETERS, P.L.C.  
PHOENIX, ARIZONA

OF COUNSEL  
OGARRIO Y DIAZ ABOGADOS  
MEXICO, D.F., MEXICO  
(LICENSED SOLELY IN MEXICO)

June 11, 1999

Arizona Corporation Commission  
**DOCKETED**

JUN 14 1999

Ms. Nancy Kole  
Docket Control Division  
Arizona Corporation Commission  
1200 West Washington  
Phoenix, Arizona 85007

DOCKETED BY	<i>[Signature]</i>
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**RE: Docket Nos. E-01645A-98-0473, E-01345A-97-0773, and  
RE-00000C-94-0165**

Dear Ms. Kole:

Enclosed for filing are the original and eleven (11) copies of PG&E Energy Services Corporation's Comments in Support of Enron Corp's Motion to Amend Procedural Order To Establish Revised Procedural Dates in the above matters. Please return a conformed copy to my office in the enclosed self-addressed envelope.

Please let me know if you have any questions regarding the above or the enclosed materials.

Sincerely,

*[Signature of Lawrence V. Robertson, Jr.]*

Lawrence V. Robertson, Jr.

LVR:djb

Enclosures

BEFORE THE ARIZONA CORPORATION COMMISSION

ORIGINAL

CARL J. KUNASEK

Commissioner-Chairman

Arizona Corporation Commission

JIM IRVIN

Commissioner

RENZ JENNINGS

Commissioner

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JUN 14 1999

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IN THE MATTER OF THE APPLICATION  
OF ARIZONA PUBLIC SERVICE  
COMPANY FOR APPROVAL OF ITS  
PLAN FOR STRANDED COST RECOVERY

DOCKET NO. E-01345A-98-0473

IN THE MATTER OF FILING OF  
ARIZONA PUBLIC SERVICE COMPANY  
OF UNBUNDLED TARIFFS PURSUANT  
TO A.A.C. R14-2-1601 ET SEQ.

DOCKET NO. E-01345A-97-0773

IN THE MATTER OF COMPETITION  
IN THE PROVISION OF ELECTRIC  
SERVICES THROUGHOUT THE STATE  
OF ARIZONA

DOCKET NO. RE-00000C-94-0165

**PG&E ENERGY SERVICES CORPORATION'S COMMENTS IN SUPPORT  
OF ENRON CORP'S MOTION TO AMEND PROCEDURAL ORDER  
TO ESTABLISH REVISED PROCEDURAL DATES**

PG&E Energy Services Corporation ("PG&E ES") hereby submits these comments in support of Enron Corp's Motion to Amend Procedural Order To Establish Revised Procedural Dates ("Motion"). In the interest of brevity, PG&E ES hereby incorporates the discussion and request set forth in Enron's Motion as its own.

1 In addition, PG&E ES would note that, with the impending appointment of a new member  
2 to the Commission as a consequence of the Arizona Supreme Court's decision earlier this week, in  
3 all likelihood there will be a "learning curve" that new member will need to master before he or she  
4 is "up to speed" to rule upon questions that are central to the onset of effective retail electric  
5 competition. The resolution of stranded cost and unbundled tariff issues pertaining to the state's  
6 largest Affected Utility are clearly questions of that nature, as are certain of the other issues  
7 presented by the May 14, 1999 Settlement Agreement. Hence, a grant of the modest extension of  
8 procedural dates requested by Enron would be both consistent with and conducive to informed  
9 decision making by the Commission on these crucial matters.  
10  
11

12 During the past three (3) years, PG&E ES has frequently urged that the Commission press  
13 ahead and keep the transition to retail electric competition "on track." PG&E ES is not departing  
14 from that general objective at this time. However, under the circumstances discussed in Enron's  
15 Motion and these Comments, PG&E ES believes that the slight "throttling back" herein requested  
16 is appropriate and constructive. Like Enron, PG&E ES believes the procedural schedule established  
17 in the May 25, 1999 Procedural Order is unnecessarily truncated, and imposes unwarranted burdens  
18 on parties who may wish to oppose or propose modifications to the May 14 Settlement Agreement.  
19

20 DATED this 11<sup>th</sup> day of June, 1999.

21  
22 Respectfully submitted,  
PG&E ENERGY SERVICES CORPORATION,

23 By Lawrence V. Robertson

24 Lawrence V. Robertson, Jr.  
25 MUNGER CHADWICK, P.L.C.  
26 National Bank Plaza  
27 333 North Wilmot, Suite 300  
28 Tucson, Arizona 85711  
Its Attorney

1 Original mailed this  
2 11<sup>th</sup> day of June, 1999, to:

3 Steven M. Wheeler  
4 Thomas L. Mumaw  
5 Jeffrey B. Guldner  
6 SNELL & WILMER, LLP  
7 One Arizona Center  
8 400 East Van Buren  
9 Phoenix, AZ 85004  
10 Attorneys for APS

11 A copy of the foregoing mailed  
12 this 11th day of June, 1999, to:

13 Hon. Jerry Rudibaugh  
14 Chief Hearing Officer  
15 Arizona Corporation Commission  
16 1200 West Washington  
17 Phoenix, Arizona 85007

18 Paul Bullis, Chief Counsel  
19 Legal Division  
20 Arizona Corporation Commission  
21 1200 West Washington  
22 Phoenix, Arizona 85007

23 Ms. Leslie Lawner  
24 Director of Government Affairs  
25 Enron Corp  
26 712 North Lea  
27 Roswell, New Mexico 88201  
28 Attorney for Enron Corp.

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